

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re: Chapter 11
WISCONSIN & MILWAUKEE HOTEL, LLC, Case No. 24-21743
Debtor. Honorable G. Michael Halfenger

**STIPULATION REGARDING LENDERS' OBJECTION TO DEBTOR'S
APPLICATION FOR ORDER AUTHORIZING THE RETENTION AND
EMPLOYMENT OF MALLERY S.C. AS SPECIAL COUNSEL FOR A SPECIFIC
PURPOSE EFFECTIVE AS OF MARCH 31, 2025**

Computershare Trust Company, N.A. (“Computershare”), Wisconsin & Milwaukee Hotel Funding LLC (“Funding,” and together with Computershare, “Lenders”), and Wisconsin & Milwaukee Hotel, LLC (“Debtor”), submit this stipulation regarding Lenders’ Objection (the “Objection”) to *Debtor’s Application for Order Authorizing the Retention and Employment of Mallery S.C. as Special Counsel for a Specific Purpose Effective as of March 31, 2025* (ECF #476) (the “Mallery Application”).

RECITALS

- A. Debtor filed the Mallery Application on March 31, 2025. Lenders filed their Objection on April 4, 2025 (ECF #485).
- B. Debtor submitted a brief in support of its Mallery Application on April 15, 2025 (ECF # 516), and since that date Lenders and Debtor have negotiated a resolution of the Objection on the terms set forth herein.

STIPULATION

In consideration of the foregoing recitals, Lenders and Debtor hereby stipulate and agree as follows:

1. Attorney Herreman of the Mallery firm agrees not to represent the Debtor's owner, Jackson Street Management, on any matters during the term of the engagement contemplated by the Mallery Application; and
2. In exchange, Lenders withdraw the Objection to the Mallery Application.
3. To the extent necessary, the Court may enter an order consistent with this Stipulation.

DATED: April 24, 2025

COMPUTERSHARE TRUST CO., N.A. and
WISCONSIN & MILWAUKEE HOTEL
FUNDING, LLC

BY: /s/ Frank W. DiCastri

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